

6/26/06 - 00682

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From: Barber.Joshua@epamail.epa.gov
Sent: Monday, June 26, 2006 9:20 AM
To: agnes.sullivan@navy.mil; Barber.Joshua@epamail.epa.gov; kmdoran@deq.virginia.gov; Henderson, Kimberly/VBO
Subject: EPA BTAG Comments: Electronic Deliverable Format, Baseline Ecological Risk Assessment, Blows Creek Watershed; St. Juliens Creek Annex, Chesapeake, Virginia

Agnes, et al., - Below are the comments submitted by the EPA BTAG regarding the above referenced document. The comments pertain only to the electronic deliverable format. Technical comments on the baseline risk assessment were submitted on April 27, 2006.

In general, while the electronic deliverable format for the Baseline Ecological Risk Assessment (e-BERA) offers some advantages and can facilitate the technical review of a BERA, it is the opinion of the BTAG that the e-BERA as submitted does not meet the most basic reporting requirements for a risk assessment.

The narrative provided is too abbreviated and does not adequately explain the risk assessment process, the data used, or the basis for the conclusions for the assessment. The most succinct description of the "document" offered by a reviewer was that it appeared that someone reviewed the risk assessment, took notes, and only provided the highlights for this version of the BERA.

The e-BERA itself is not easily accessible. Depending on the security settings of the computer that is being used, it may be difficult, if not impossible, to open the electronic files. It cannot be assumed that the public will have their computer's settings configured so they can review the document, nor can it be assumed that the public will be able to determine what settings need to be changed to enable viewing and will be able to make the necessary changes.

Related to the previous comment, the instructions for using the interactive CD if it does not auto launch are not applicable to every computer or operating system. It is not applicable to Windows XP. It should also be noted that the e-BERA will not auto launch on a MAC nor do the links function appropriately.

A minor technical issue with the e-BERA is the inability to adjust the "view" to fit oversized windows onto screen so the reviewer does not have to scroll to view the page.

The most significant advantage of the e-BERA is the linkage between the limited text, data, figures, and site photos / graphics. The linking of the tables and figures to the text is a monumental improvement over the hardcopy version. The linkages facilitate the review by providing ready access to all data elements that must be evaluated by the reviewer.

Unfortunately, this is also one of the biggest drawbacks of the submittal: the evaluation must be completed by the reviewer. The document does not present a sufficient evaluation of the data, just the data and conclusions.

Also, the document essentially only presents pre-selected information that is used to drive the decisions, rather than providing all of the information and the subsequent justification / rationale for focusing on the relevant issues.

While the linkage between the data tables and text or figures is extremely helpful, the fact that the data tables are only available in PDF format limits the functionality of the electronic format. BTAG has requested on more than one occasion that the spreadsheets or databases used for food chain modeling be submitted for review. Use of an electronic format should facilitate addressing this request. The e-BERA would be more useful if the data tables were interactive and "sortable" or searchable, similar to Navy-GIS deliverables that have been developed.

All of the interactive figures were very helpful and facilitated the review process and understanding of site conditions. They would be more user-friendly if the mouse-over

function on the figures would display the combined results of chemistry and toxicity tests. If these types of tables were linked, you would be able to view sample location, chemistry results and bioassay results on one screen, further facilitating the review.

It would be helpful if the figures and tables could be easily accessed at any time. One approach would be to expand the menu links on the left side of the screen to include a linked index or table of contents (similar to what can be made available in a PDF document) identifying each of the figures and tables.

And finally, the electronic format is ideal for ensuring that important supporting documentation, particularly that from the SLERA, is available during the review process. Unfortunately, the opportunity was not utilized. It would have been useful if key information such as the ecotox profiles and information pertinent to the potential occurrence / presence of endangered or threatened species were included on the CD.

Thank you for the opportunity to review this document.

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